

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

\$102,546.00 IN U.S. CURRENCY,

Defendant,

and

ROBERT EDWARD BURTON,

Claimant.

Case No. 21-mc-_____

**STIPULATION TO EXTEND
TIME TO COMMENCE
JUDICIAL FORFEITURE
PROCEEDINGS**

The Plaintiff and the Claimant stipulate, pursuant to 18 U.S.C. § 983(a)(3)(A), to extend the time in which the Plaintiff is required to file a Complaint for Forfeiture or to obtain an Indictment alleging forfeiture until March 8, 2022.

1. On or about June 10, 2021, Drug Enforcement Administration (“DEA”) officers seized \$102,546.00 in U.S. Currency from Claimant Robert Burton and Rachel Stanton during execution of a Minnesota State Search warrant in Burnsville, Minnesota.

2. The Drug Enforcement Administration (DEA) commenced administrative forfeiture proceedings for the Defendant Currency and sent written notice to all known interested parties of its intent to forfeit the currency.

3. On September 8, 2021, Robert Burton filed a claim for the Defendant Currency through his attorney, Craig Cascarano.

4. The time has expired for any other person to file a claim for the Defendant

United States v. \$74,300.00 – Stipulation to Extend CAFRA Deadline

Currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no other claims for any portion of the currency have been received from any other individual or entity.

5. Under 18 U.S.C. § 983(a)(3)(A), the government has 90 days after a claim has been filed in an administrative action to bring a civil complaint for forfeiture, “except that a court in the district in which the complaint will be filed may extend the period for filing a complaint for good cause shown or upon agreement of the parties.”

6. The parties agree to extend the deadline under 18 U.S.C. § 983(a)(3) for filing a judicial forfeiture proceeding with respect to the Defendant Currency until March 8, 2022 for additional time to discuss a potential resolution.

Dated: December 1, 2021

CHARLES J. KOVATS, Jr.
Acting United States Attorney

s/ QUINN HOCHHALTER
BY: QUINN HOCHHALTER
Assistant U.S. Attorney
Attorney ID No. 07791ND
600 United States Courthouse
300 South Fourth Street
Minneapolis, MN 55415
612-664-5600
Quinn.hochhalter@usdoj.gov

Date: December 1, 2021

CASCARANO LAW OFFICE

s/ *Q. Hochhalter for Craig Cascarano*
CRAIG CASCARANO
150 South 5th Street, Suite 2860
Minneapolis, MN 55402
Craig@craigcascaranolaw.com

Attorney for Claimant
ROBERT BURTON